

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TERRY D. DIXON,

Petitioner,

vs.

RENEE BAKER, et al.,

Respondents.

Case No. 3:13-cv-00248-RJC-CSD

**ORDER GRANTING UNOPPOSED
MOTION FOR ENLARGEMENT OF
TIME TO FILE REPLY IN SUPPORT
OF MOTION TO DISMISS (ECF NO.
71)**

(SECOND REQUEST)

Respondents move this Court for an enlargement of time of 14 days from the current due date of February 25, 2022, up to and including March 11, 2022, in which to file their reply in support of their motion to dismiss Terry Dixon's Second Amended Petition (ECF No. 61). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the second enlargement of time sought by Respondents to file the reply, and the request is brought in good faith and not for the purpose of delay.

DATED February 25, 2022.

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Jessica Perlick
Jessica Perlick (Bar. No. 13218)
Senior Deputy Attorney General

DECLARATION OF JESSICA PERLICK

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JESSICA PERLICK, being first duly sworn under oath, deposes and states as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Senior Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Terry D. Dixon v. Renee Baker, et al.*, Case No. 3:13-cv-00248-RJC-CSD, and as such, have personal knowledge of the matters contained herein.

2. This motion is made in good faith and not for the purposes of delay.

3. The deadline to file the reply in support of the motion to dismiss Dixon's second amended petition (ECF No. 61) is February 25, 2022.

4. I previously requested an extension for this reply, as well as a response to Dixon's motion for evidentiary hearing, to account for already-existing deadlines including a reply brief in *Murray v. Howell*, 21-15104, responses in *Shue v. Johnson*, 2:20-cv-02025; *Guevara-Pontifes v. Baker*, 3:20-cv-00652; and *Palmer v. Gittere*, 3:18-cv-00245; and an answering brief in *Connors v. Hutchings*, 21-15693; as well as the time needed to provide coverage during colleagues' annual leave.


5. I have been unable with due diligence to complete the reply herein. In my previous request, I referenced the need to prioritize an answer in *Guy v. Baca*, 2:11-cv-01809, which is unfortunately still in progress. In January I was dealing with a health issue that was impacting my work. Although I have since recovered, I am still working to catch up on outstanding deadlines that were impacted, including the answer in *Guy*.

6. Finally, in addition to working to catch up on everything impacted by the health issues in January, last week I had oral argument in *Murray v. Howell*, 21-15104, so I also spent significant time preparing for that.

7. I have communicated with counsel for Dixon regarding this request, and she indicated that she does not object to this extension.

8. I am filing a separate request for additional time to file the response to the motion for evidentiary hearing (ECF No. 90), seeking the same 14-day extension.

4 /s/ Jessica Perlick
 5 Jessica Perlick (Bar No. 13218)

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8 UNITED STATES DISTRICT JUDGE

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